

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

GIANNA KRSTIC,

Plaintiff,

v.

SOFREGEN MEDICAL, INC., and  
ALLERGAN, INC.,

Defendants.

Civil Action No. 1:18-cv-11585-NMG

**ORAL ARGUMENT REQUESTED**

**MOTION TO DISMISS OF DEFENDANT SOFREGEN MEDICAL, INC.**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Sofregen Medical, Inc. ("Sofregen") hereby moves to dismiss with prejudice Plaintiff's Amended Complaint for failure to state a claim upon which relief can be granted. The grounds in support of this motion are set forth in the accompanying Memorandum of Law.

WHEREFORE, Sofregen respectfully request that its Motion to Dismiss be GRANTED.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Sofregen wishes to be heard and requests a hearing to assist the Court in its resolution of this Motion.

*Motion allowed. JMGorton, USDJ 4/8/19*